# Section 1. Registration Information

## Source Identification

| | |
|---|---|
| Facility Name: | Church & Dwight Company Inc. |
| Parent Company #1 Name: | |
| Parent Company #2 Name: | |

## Submission and Acceptance

| | |
|---|---|
| Submission Type: | Re-submission |
| Subsequent RMP Submission Reason: | 5-year update (40 CFR 68.190(b)(1)) |
| Description: | |
| Receipt Date: | 18-Sep-2020 |
| Postmark Date: | 18-Sep-2020 |
| Next Due Date: | 18-Sep-2025 |
| Completeness Check Date: | 11-Feb-2022 |
| Complete RMP: | Yes |
| De-Registration / Closed Reason: | |
| De-Registration / Closed Reason Other Text: | |
| De-Registered / Closed Date: | |
| De-Registered / Closed Effective Date: | |
| Certification Received: | Yes |

## Facility Identification

| | |
|---|---|
| EPA Facility Identifier: | 1000 0010 6495 |
| Other EPA Systems Facility ID: | NJR-000025502 |
| Facility Registry System ID: | |

## Dun and Bradstreet Numbers (DUNS)

| | |
|---|---|
| Facility DUNS: | |
| Parent Company #1 DUNS: | |
| Parent Company #2 DUNS: | |

## Facility Location Address

| | |
|---|---|
| Street 1: | 800 Airport Road |
| Street 2: | |
| City: | Lakewood |
| State: | NEW JERSEY |
| ZIP: | 08701 |
| ZIP4: | |
| County: | OCEAN |

## Facility Latitude and Longitude

| | |
|---|---|
| Latitude (decimal): | 40.061667 |
| Longitude (decimal): | -074.179444 |
| Lat/Long Method: | Interpolation - Digital map source (TIGER) |
| Lat/Long Description: | Center of Facility |
| Horizontal Accuracy Measure: | 10 |
| Horizontal Reference Datum Name: | World Geodetic System of 1984 |
| Source Map Scale Number: | |

## Owner or Operator

| | |
|---|---|
| Operator Name: | Church & Dwight Company Inc. |
| Operator Phone: | (732) 730-3100 |

## Mailing Address

| | |
|---|---|
| Operator Street 1: | 800 Airport Road |
| Operator Street 2: | |
| Operator City: | Lakewood |
| Operator State: | NEW JERSEY |
| Operator ZIP: | 08701 |
| Operator ZIP4: | |
| Operator Foreign State or Province: | |
| Operator Foreign ZIP: | |
| Operator Foreign Country: | |

## Name and title of person or position responsible for Part 68 (RMP) Implementation

| | |
|---|---|
| RMP Name of Person: | Jennifer Toro |
| RMP Title of Person or Position: | EHS Manager |
| RMP E-mail Address: | jennifer.toro@churchdwight.com |

## Emergency Contact

| | |
|---|---|
| Emergency Contact Name: | Jennifer Toro |
| Emergency Contact Title: | EHS Manager |
| Emergency Contact Phone: | (732) 730-3173 |
| Emergency Contact 24-Hour Phone: | (848) 226-0419 |
| Emergency Contact Ext. or PIN: | |
| Emergency Contact E-mail Address: | jennifer.toro@churchdwight.com |

## Other Points of Contact

| | |
|---|---|
| Facility or Parent Company E-mail Address: | |
| Facility Public Contact Phone: | |
| Facility or Parent Company WWW Homepage Address: | |

## Local Emergency Planning Committee

| | |
|---|---|
| LEPC: | Lakewood Township OEM |

## Full Time Equivalent Employees

| | |
|---|---|
| Number of Full Time Employees (FTE) on Site: | 400 |
| FTE Claimed as CBI: | |

## Covered By

| | |
|---|---|
| OSHA PSM : | Yes |
| EPCRA 302 : | Yes |
| CAA Title V: | |

Air Operating Permit ID:

## OSHA Ranking

OSHA Star or Merit Ranking:

## Last Safety Inspection

| | |
|---|---|
| Last Safety Inspection (By an External Agency) Date: | 16-Nov-2021 |
| Last Safety Inspection Performed By an External Agency: | State environmental agency |

## Predictive Filing

Did this RMP involve predictive filing?:

## Preparer Information

| | |
|---|---|
| Preparer Name: | Larry Aleksandrich |
| Preparer Phone: | (908) 672-2514 |
| Preparer Street 1: | 33 Monroe Avenue |
| Preparer Street 2: | |
| Preparer City: | Carteret |
| Preparer State: | NEW JERSEY |
| Preparer ZIP: | 07008 |
| Preparer ZIP4: | 1808 |
| Preparer Foreign State: | |
| Preparer Foreign Country: | |
| Preparer Foreign ZIP: | |

## Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

## Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

## Process Chemicals

| | |
|---|---|
| Process ID: | 1000111812 |
| Description: | Aerosol Can Filling |
| Process Chemical ID: | 1000139781 |
| Program Level: | Program Level 3 process |
| Chemical Name: | Flammable Mixture |
| CAS Number: | 00-11-11 |
| Quantity (lbs): | 229000 |
| CBI Claimed: | |
| Flammable/Toxic: | Flammable |

### Flammable Mixture Chemical Components

| | |
|---|---|
| Flammable Mixture Chemical ID: | 1000123303 |
| Chemical Name: | Isobutane [Propane, 2-methyl] |
| CAS Number: | 75-28-5 |
| Flammable/Toxic: | Flammable |

| | |
|---|---|
| Flammable Mixture Chemical ID: | 1000123304 |
| Chemical Name: | Butane |
| CAS Number: | 106-97-8 |
| Flammable/Toxic: | Flammable |

| | |
|---|---|
| Flammable Mixture Chemical ID: | 1000123305 |
| Chemical Name: | Propane |
| CAS Number: | 74-98-6 |
| Flammable/Toxic: | Flammable |

| | |
|---|---|
| Flammable Mixture Chemical ID: | 1000123306 |
| Chemical Name: | Difluoroethane [Ethane, 1,1-difluoro-] |
| CAS Number: | 75-37-6 |
| Flammable/Toxic: | Flammable |

## Process NAICS

| | |
|---|---|
| Process ID: | 1000111812 |
| Process NAICS ID: | 1000113124 |
| Program Level: | Program Level 3 process |
| NAICS Code: | 325611 |
| NAICS Description: | Soap and Other Detergent Manufacturing |

# Section 2. Toxics: Worst Case

No records found.

# Section 3. Toxics: Alternative Release

No records found.

# Section 4. Flammables: Worst Case

## Flammable Worst ID: 1000067878

| | |
|---|---|
| Model Used: | EPA's OCA Guidance Reference Tables or Equations |
| Endpoint used: | 1 PSI |

### Passive Mitigation Considered

Blast Walls:

Other Type:

# Section 5. Flammables: Alternative Release

## Flammable Alter ID: 1000063630

| | |
|---|---|
| Model Used: | EPA's OCA Guidance Reference Tables or Equations |

### Passive Mitigation Considered

| | |
|---|---|
| Dikes: | |
| Fire Walls: | |
| Blast Walls: | |
| Enclosures: | |
| Other Type: | |

### Active Mitigation Considered

| | |
|---|---|
| Sprinkler System: | |
| Deluge System: | |
| Water Curtain: | |
| Excess Flow Valve: | Yes |
| Other Type: | |

# Section 6. Accident History

No records found.

# Section 7. Program Level 3

## Description

Aerosol Can Filling Operation

## Program Level 3 Prevention Program Chemicals

| | |
|---|---|
| Prevention Program Chemical ID: | 1000119104 |
| Chemical Name: | Flammable Mixture |
| Flammable/Toxic: | Flammable |
| CAS Number: | 00-11-11 |

| | |
|---|---|
| Process ID: | 1000111812 |
| Description: | Aerosol Can Filling |
| Prevention Program Level 3 ID: | 1000095381 |
| NAICS Code: | 325611 |

## Safety Information

| | |
|---|---|
| Safety Review Date (The date on which the safety information was last reviewed or revised): | 11-Sep-2020 |

## Process Hazard Analysis (PHA)

| | |
|---|---|
| PHA Completion Date (Date of last PHA or PHA update): | 30-May-2018 |

## The Technique Used

| | |
|---|---|
| What If: | |
| Checklist: | |
| What If/Checklist: | Yes |
| HAZOP: | Yes |
| Failure Mode and Effects Analysis: | |
| Fault Tree Analysis: | |
| Other Technique Used: | |
| PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update): | 15-May-2023 |

## Major Hazards Identified

| | |
|---|---|
| Toxic Release: | |
| Fire: | Yes |
| Explosion: | Yes |
| Runaway Reaction: | |
| Polymerization: | |
| Overpressurization: | Yes |
| Corrosion: | Yes |
| Overfilling: | Yes |
| Contamination: | |
| Equipment Failure: | Yes |
| Loss of Cooling, Heating, Electricity, Instrument Air: | Yes |

| | |
|---|---|
| Earthquake: | Yes |
| Floods (Flood Plain): | Yes |
| Tornado: | Yes |
| Hurricanes: | Yes |
| Other Major Hazard Identified: | Lightning |

## Process Controls in Use

| | |
|---|---|
| Vents: | |
| Relief Valves: | Yes |
| Check Valves: | Yes |
| Scrubbers: | |
| Flares: | |
| Manual Shutoffs: | Yes |
| Automatic Shutoffs: | Yes |
| Interlocks: | |
| Alarms and Procedures: | Yes |
| Keyed Bypass: | |
| Emergency Air Supply: | |
| Emergency Power: | |
| Backup Pump: | |
| Grounding Equipment: | Yes |
| Inhibitor Addition: | |
| Rupture Disks: | |
| Excess Flow Device: | Yes |
| Quench System: | |
| Purge System: | |
| None: | |
| Other Process Control in Use: | |

## Mitigation Systems in Use

| | |
|---|---|
| Sprinkler System: | Yes |
| Dikes: | |
| Fire Walls: | |
| Blast Walls: | |
| Deluge System: | Yes |
| Water Curtain: | |
| Enclosure: | Yes |
| Neutralization: | |
| None: | |
| Other Mitigation System in Use: | Ventilation System and fire monitor |

## Monitoring/Detection Systems in Use

| | |
|---|---|
| Process Area Detectors: | Yes |
| Perimeter Monitors: | Yes |
| None: | |
| Other Monitoring/Detection System in Use: | |

## Changes Since Last PHA Update

| | |
|---|---|
| Reduction in Chemical Inventory: | |
| Increase in Chemical Inventory: | |
| Change Process Parameters: | |

| | |
|---|---|
| Installation of Process Controls: | |
| Installation of Process Detection Systems: | |
| Installation of Perimeter Monitoring Systems: | |
| Installation of Mitigation Systems: | |
| None Recommended: | |
| None: | Yes |
| Other Changes Since Last PHA or PHA Update: | |

## Review of Operating Procedures

| | |
|---|---|
| Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): | 08-Jun-2020 |

## Training

| | |
|---|---|
| Training Revision Date (The date of the most recent review or revision of training programs): | 02-Oct-2017 |

## The Type of Training Provided

| | |
|---|---|
| Classroom: | Yes |
| On the Job: | Yes |
| Other Training: | |

## The Type of Competency Testing Used

| | |
|---|---|
| Written Tests: | Yes |
| Oral Tests: | |
| Demonstration: | Yes |
| Observation: | Yes |
| Other Type of Competency Testing Used: | |

## Maintenance

| | |
|---|---|
| Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): | 15-May-2015 |
| Equipment Inspection Date (The date of the most recent equipment inspection or test): | 18-Sep-2020 |
| Equipment Tested (Equipment most recently inspected or tested): | Propellant tank farm |

## Management of Change

| | |
|---|---|
| Change Management Date (The date of the most recent change that triggered management of change procedures): | 09-Nov-2019 |
| Change Management Revision Date (The date of the most recent review or revision of management of change procedures): | 12-Dec-2009 |

## Pre-Startup Review

| | |
|---|---|
| Pre-Startup Review Date (The date of the most recent pre-startup review): | 20-Nov-2019 |

## Compliance Audits

| | |
|---|---|
| Compliance Audit Date (The date of the most recent compliance audit): | 15-Nov-2019 |
| Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): | 15-Nov-2020 |

## Incident Investigation

| | |
|---|---|
| Incident Investigation Date (The date of the most recent incident investigation (if any)): | |
| Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation): | |

## Employee Participation Plans

| | |
|---|---|
| Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): | 12-Dec-2009 |

## Hot Work Permit Procedures

| | |
|---|---|
| Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): | 04-Sep-2014 |

## Contractor Safety Procedures

| | |
|---|---|
| Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): | 12-Dec-2009 |
| Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance): | 31-Mar-2015 |

## Confidential Business Information

| | |
|---|---|
| CBI Claimed: | |

# Section 8. Program Level 2

No records found.

# Section 9. Emergency Response

## Written Emergency Response (ER) Plan

| | |
|---|---|
| Community Plan (Is facility included in written community emergency response plan?): | Yes |
| Facility Plan (Does facility have its own written emergency response plan?): | Yes |
| Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): | Yes |
| Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): | Yes |
| Healthcare (Does facility's ER plan include information on emergency health care?): | Yes |

## Emergency Response Review

| | |
|---|---|
| Review Date (Date of most recent review or update of facility's ER plan): | 19-Aug-2020 |

## Emergency Response Training

| | |
|---|---|
| Training Date (Date of most recent review or update of facility's employees): | 03-Dec-2019 |

## Local Agency

| | |
|---|---|
| Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): | Lakewood |
| Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): | (732) 370-7360 |

## Subject to

| | |
|---|---|
| OSHA Regulations at 29 CFR 1910.38: | Yes |
| OSHA Regulations at 29 CFR 1910.120: | |
| Clean Water Regulations at 40 CFR 112: | Yes |
| RCRA Regulations at CFR 264, 265, and 279.52: | Yes |
| OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: | Yes |
| State EPCRA Rules or Laws: | Yes |
| Other (Specify): | |

# Executive Summary

EXECUTIVE SUMMARY

Church & Dwight Company Inc. manufactures consumer products at our plant in Lakewood. We have a strong commitment to operate our facility in a safe and responsible manner.

Difluoroethane and flammable propellant blends are used at our facility as a propellant in our aerosol consumer products. The propellant blends are contained in a closed loop system; it is designed to remain inside the piping, vessels, and filling area in our facility.

A. Describe the Accident Release Prevention and Emergency Policies

Church & Dwight Company Inc. takes many precautions to prevent or minimize accidental releases of propellant from the aerosol filling system. These precautions include safety controls (alarms, detectors, and automatic shutdown devices) which are designed to identify and prevent potentially unsafe conditions like propellant leaks. We also have a preventive maintenance program designed to maintain the on-going integrity of the systems, a training program designed to ensure that the systems are operated by qualified personnel, and to respond quickly to system upsets.

The Environmental Project Engineer is responsible for the management of the aerosol safety programs.

B. Stationary Source and Regulated Substances Handled

The facility operates an aerosol filling system with difluoroethane and propellant blends. Difluoroethane and propellant blends are covered by the Accidental Release Prevention Regulations handled at the Lakewood plant.

C. Description of the Accidental Release Prevention Program

The facility has an accident release prevention program that complies with Occupational Safety and Health Act's Process Safety Management Standard and EPA's Risk Management Program Regulation. The prevention program consists of the following elements:

- Employee Participation Program
- Process Safety Information
- Process Hazard Analysis
- Operating Procedures
- Training Program
- Contractor Safety Program
- Pre-Startup Safety Review Procedures
- Mechanical Integrity Program
- Hot Work Permit Procedures
- Management of Change Procedures
- Incident Investigation Procedures
- Compliance Audit Procedures

D. Five-Year Accident History

There have been no arerosol propellant-related accidents at the Lakewood plant in the past ten years.

E. Description of the Emergency Response Program

An emergency response program has been implemented at the Lakewood plant. This program contains procedures describing how

the facility will respond to propellant leaks, spills and other emergencies, including evacuation procedures.

F. Planned Changes to Improve Safety

Church & Dwight Company Inc. is committed to operating our aerosol filling system in a safe and responsible manner. We are continually evaluating our equipment and procedures to meet this objective.